Report to the Director
Office of Law Enforcement and Security

Security Assessment of the Statue of Liberty
National Monument

Assessment Dates: October 19 – 23, 2010
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## List of Abbreviations and Acronyms

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<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>CCTV</td>
<td>Closed Circuit Television</td>
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<tr>
<td>COR</td>
<td>Contracting Officer’s Representative</td>
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<tr>
<td>COTR</td>
<td>Contracting Officer’s Technical Representative</td>
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<tr>
<td>DOI</td>
<td>Department of the Interior</td>
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<tr>
<td>EOD</td>
<td>Explosive Ordnance Detection</td>
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<td>EECS</td>
<td>Electronic Entry Control System</td>
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<td>IDS</td>
<td>Intrusion Detection Systems</td>
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<td>JTTF</td>
<td>Joint Terrorism Task Force</td>
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<td>NCI</td>
<td>National Critical Infrastructure</td>
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<td>OIG</td>
<td>Office of Inspector General</td>
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<td>OLES</td>
<td>Office of Law Enforcement and Security</td>
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<td>STLTI</td>
<td>Statue of Liberty National Monument</td>
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<td>UPS</td>
<td>Uninterrupted Power Supply</td>
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<td>USPP</td>
<td>United States Park Police</td>
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Executive Summary

This report documents the findings of a security assessment conducted on the Statue of Liberty National Monument (STLI) by the Department of the Interior (Department) Office of Law Enforcement and Security (OLES) in October, 2010. This is the fourth review conducted by OLES of STLI, the first completed in 2004.

This evaluation served to determine if the United States Park Police (USPP) and the National Park Service (NPS) are in compliance with the overall requirements established in Department Manual (DM), Part 444 Chapter 2 (444DM2) entitled, “National Critical Infrastructure and Key Resource Security”. Generally speaking, 444DM2 sets forth the security requirements the Department deems minimally necessary to safeguard the National Critical Infrastructure and Key Resource assets it owns, operates and/or controls. These requirements are presented in five general categories; Security Personnel, Perimeter Security, Access Control, Interior Security, and Security Planning. Working directly with USPP personnel from the New York Field Office and the National Park Service, the OLES evaluation focused on assessing the level of compliance within each of these five categories.

At its conclusion, the evaluation revealed that the USPP and National Park Service...
Background

As a result of Secretarial Law Enforcement Directive 14, the OLES was directed to develop a security policy for the Department. On April 7, 2006, the Department approved 444DM2, National Critical Infrastructures and Key Resource (CI/KR) Security.

The Department of the Interior formally designated the Statue of Liberty as a National Monument and ICON (NM&I) and it ranks among the top ten DOI Critical Infrastructures and Key Resources.

The Department has conducted several security reviews of STLI since September 11th, 2001. This is the fourth review conducted by OLES of the Statue of Liberty National Monument; the most recent was conducted in April, 2007.
Scope and Methodology

Scope: Directive 14 of the Secretary’s law enforcement reforms\(^1\) adopted the recommendations made by the Interior Office of Inspector General in 2002\(^2\) and placed responsibility for DOI security policy oversight and compliance with OLES. By way of implementing this directive, OLES established a Security Division to provide guidance, oversight and support, and ensure compliance with Departmental security policies and procedures.

In an effort to further implement Directive 14, OLES issued 444DM, Chapter 2, entitled, “National Critical Infrastructure and Key Resource Security.” 444DM2 establishes the security requirements deemed minimally necessary to safeguard National Critical Infrastructure and Key Resource assets owned and/or controlled by the Department and was developed in coordination with DOI bureaus and offices in response to the “The National Strategy for the Physical Protection of Critical Infrastructures and Key Assets” (February 2003) and Homeland Security Presidential Directive-7 “Critical Infrastructure Identification, Prioritization, and Protection” (December 2003).

Methodology: During the period of October 19 through 23, 2010, the OLES Security Division conducted a security assessment of the Statue of Liberty National Monument to assess the facility’s compliance with the security requirements established in 444DM2. Generally speaking, these requirements are presented in five categories; Security Personnel, Perimeter Security, Access Control, Interior Security, and Security Planning. The evaluation focused on assessing the level of compliance within each of these categories.

The evaluation process consisted of informal interviews and group discussions with USPP and NPS personnel; on site examination of facility infrastructure components, physical security systems, and operational procedures; and a review of relevant documentation to include prior risk assessments, Security Guard Post Orders, staffing models, security related standard operating procedures, and physical security infrastructure improvement contracts. Appendix 1 of this report lists evaluation participants.

Findings and Recommendations

Please Note: In an effort to limit repetition in the narrative, where a specific minimum requirement was found to be applicable to more than one general category \(^2\) discussion of the requirement has been confined to a single category.

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\(^1\) See Law Enforcement at the Department of the Interior, Recommendations to the Secretary for Implementing Law Enforcement Reforms, July 2002.

Photo No. 1 Ellis Island Bridge Vehicle Barrier
Photo No. 4: Screening Facility at Battery Park

(Interior Security)

(b) (7)(E)
Security Planning

Conclusions

The USPP and the NPS are attempting to achieve full compliance with all aspects of 444DM2. Although not at full staffing, the USPP have made significant progress in reaching acceptable staffing levels. Several security improvements and equipment upgrades have been completed, or are in the planning stage. (b) (7)(E)
The Office of Law Enforcement and Security remains committed with the NPS and USPP to ensure that the appropriate level of security is in place at the Statue of Liberty. In closing, the OLES review team would like to acknowledge the USPP and NPS management for their assistance in conducting this review.
Appendix 1

Assessment Participants

Office of Law Enforcement and Security

- Supervisory Special Agent
- Security Specialist
- Security Specialist

United States Park Police

- Commander, New York Field Office
- Commander, Liberty District
- Commander, S.W.A.T. and K-9

National Park Service

- Deputy Superintendent